

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 42 (MC2012-47)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2012-57

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(October 22, 2015)

The United States Postal Service hereby moves for temporary relief, to allow the existing contract in this docket to remain in effect for fifteen (15) additional days. The existing contract is set to expire on October 24, 2015, pursuant to PRC Order No. 2718. The Postal Service recognizes that the instant motion is not being filed, as is required, more than seven days prior to the contract's effective date, which is a result of administrative oversight on the part of the Postal Service. Nevertheless, the Postal Service respectfully requests that the Commission grant temporary relief in this instance, in order to avoid any interruption in the customer's access to negotiated rates.

The Postal Service received a signed successor agreement from the customer on October 3, 2015, and intended to file it with the Commission during the week of October 5, which would have provided the Commission with ample time to review the successor contract prior to the October 24 expiration date, and would have avoided the need for this additional motion for relief. However, the contract unexpectedly required additional time for internal financial review. This delay was compounded by the press of other business in other dockets. And as a result of administrative oversight, this delay was not communicated to the appropriate personnel in order to file a timely motion for relief last week.

Nevertheless, the successor contract has now received all necessary internal review and approvals, and the Postal Service expects to file it with the Commission tomorrow, October 23, 2015. Therefore, the Postal Service respectfully requests that the Commission grant an additional fifteen (15) day extension to allow the existing contract to remain in effect, until such time as the Commission has an opportunity to complete its review of the successor contract. Thus, the proposed extension would only last for a finite and short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for fifteen additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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